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Attorneys for Plaintiff

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ALASKA

UNITED STATES OF AMERICA,)	No. 3:21-cr-00062-JMK -MMS
)	
Plaintiff,)	<u>COUNT 1:</u>
)	CYBERSTALKING
vs.)	Vio. of 18 U.S.C. §§ 2261A(2)(A) and
)	(B), 2261(b)(6)
ROLANDO HERNANDEZ-)	
ZAMORA,)	
)	
Defendant.)	
_____)	

F I R S T S U P E R S E D I N G I N D I C T M E N T

The Grand Jury charges that:

COUNT 1

Beginning in about May 2016, the exact date being unknown, and continuing through May 29, 2020, within the District of Alaska and elsewhere, with the intent to kill,

injure, harass, intimidate, and place under surveillance with intent to kill, injure, harass, and intimidate another person, the defendant, ROLANDO HERNANDEZ-ZAMORA, used any interactive computer service and electronic communication service and electronic communication system of interstate commerce, and any other facility of interstate and foreign commerce, to engage in a course of conduct that placed that person in reasonable fear of the death of and serious bodily injury to that person and caused, attempted to cause, and would be reasonably expected to cause substantial emotional distress to that person. The defendant committed this offense in violation of a protective order.

All of which is in violation of 18 U.S.C. §§ 2261A(2)(A) and (B), 2261(b)(6).

A TRUE BILL.

s/ Grand Jury Foreperson
GRAND JURY FOREPERSON

s/ Jennifer Ivers
JENNIFER IVERS
Assistant U.S. Attorney
United States of America

s/ Christina Sherman for
E. BRYAN WILSON
Acting United States Attorney
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DATE: November 17, 2021